

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**SHIRLEY BROWN**, Individually and  
as the Administratrix of the Estate of  
Rodney Brown

**Plaintiffs,**

**v.**

**MICHAEL CHAPMAN, et al.,**

**Defendants.**

**Case No. 1:11 CV 01370**

**JUDGE CHRISTOPHER A. BOYKO**

**Proposed Joint Statement for the Jury**

Rodney Brown died following the use of force by Cleveland Police officers after a traffic stop on December 31, 2010. Rodney's mother, Shirley Brown, filed this lawsuit alleging, under federal civil rights law, that the traffic stop was done without probable cause, that excessive force was used on her son including a taser shot to his chest and a blow to his neck, and that officers failed to provide or secure adequate medical care for her son. She also alleges wrongful death and assault and battery under state law.

All the individual defendants are sued for wrongful death. The defendants on the excessive force, assault and battery, failure to protect claims are Michael Chapman, Belal Ilain and the City of Cleveland<sup>1</sup>. The defendants on the denial of medical care claim are Eric Melendez, Richard Rusnak, James Merritt, John Sattler, and the City of Cleveland. The defendants deny liability on all claims.

Respectfully Submitted,

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Jennifer L. Branch (0038893)

s/John Bacevice  
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<sup>1</sup> The Defendants have not responded yet as to whether this sentence is acceptable.

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